



MEMO ENDORSED

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July 2, 2020

VIA ECF

Hon. William H. Pauley III
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Lynch, et al. v. The City of New York*, 17-CV-7577 (WHP)

Dear Judge Pauley:

I am an Assistant Corporation Counsel assigned to represent the Defendant in the above-referenced action. The Parties previously submitted a joint status report on June 8, 2020. *See* Dkt. No. 90. On June 24, 2020, Your Honor directed the Parties to submit another status report on July 9, 2020. *See* Dkt. No. 91. I write now to respectfully request a one-week extension of the deadline, to July 16, 2020. The City makes this request, on consent, so that the Parties may continue to address certain discovery issues and then provide the Court with a more substantive update.

Prior to the Court's June 24, 2020 Order, the Parties exchanged a series of emails, and met and conferred on June 23, 2020, to address many of the specific issues that the Court identifies in its order and a number of additional items raised by Plaintiffs. In fact, the City provided a supplemental letter update to Plaintiffs today, and the Parties have a phone call scheduled to discuss these various updates tomorrow morning at 9:00 A.M. Among other things, although Defendant is moving forward with collection and review of relevant paper records and logbooks, and the City's vendor, Epiq, anticipates reopening its New Jersey facility on July 6, 2020 so as to resume those scanning efforts, Defendant is currently prioritizing the collection and production of comparable electronic records. Also, the City has or is generating and producing a number of Excel spreadsheets requested by Plaintiffs to help ascertain relevant data points – *i.e.*, bail payment and discharge times – in an effort to more efficiently and effectively aggregate and produce that information.

The requested additional week will allow the City to more fully respond to Plaintiffs' requests and for the Parties to thereafter more substantively update Your Honor and discuss the

next steps in this litigation. Additionally, I and one of my co-counsels, Mark Toews, have planned vacations next week. For these reasons, Defendant respectfully requests, on consent, that the Court extend the deadline for the joint status letter by one week to July 16, 2020.

Respectfully,

/s/ _____
Ian William Forster
Assistant Corporation Counsel

CC: *all counsel of record*

Application granted.

Dated: July 6, 2020
New York, New York

SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.